

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
**DEANNE JONES** :  
:  
**Plaintiff,** :  
:  
**- against -** :  
:  
**SENSIO, INC. d/b/a BELLA,** :  
:  
**Defendant.** :  
----- x

**Civil Action No.: 1:23-cv-00941**

**MOTION ON CONSENT TO  
ADJOURN INITIAL PRETRIAL  
CONFERENCE**

**SENSIO, INC. d/b/a BELLA,**

**Defendant.**

Defendant Sensio Inc. i/d/h/a Sensio, Inc. d/b/a Bella (“Sensio”), with consent of the plaintiff Deanne Jones, presents this Motion respectfully requesting that the Court adjourn the initial pretrial conference, currently scheduled on March 1, 2023, at 1:30 p.m. In support, Sensio states the following:

1. The plaintiff filed her Complaint in the New York County Supreme Court on December 22, 2022.
2. This case was removed to the Southern District of New York on February 3, 2023.
3. Plaintiff is represented by Taylor A. Pruett, of the law firm of Cory Watson, P.C., based in Alabama. Ms. Pruett is not admitted to practice before this Court, and therefore cannot appear at the hearing currently scheduled. Ms. Pruett advised us that she intends to move this Court for an application to appear before this Court *pro hac vice*, in conjunction with local counsel authorized to appear before this Court, and requested we consent to adjourn the conference.
4. We are advised that the Plaintiff is diligently seeking local counsel and needs additional time for local counsel to be present at the pretrial conference.

5. Sensio understands the plaintiff's need to find local counsel authorized to appear before this Court, and is amenable to the plaintiff's request. Accordingly, Sensio makes the instant Motion with at the request of and with the plaintiff's consent.

6. Plaintiff's counsel has reviewed this Motion and consents to the relief requested herein.

7. This is the Parties first request for an extension of any scheduled date, and as no Scheduling Order has been entered in this case; no other dates will be affected by a brief extension.

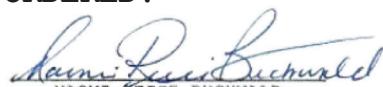
8. The Parties are available to reschedule the initial pretrial conference on one of the following:

- March 29, 2023: 9:00 a.m. – 11:00 a.m., 1:00 p.m. – 4:00 p.m.
- April 3, 2023: 9:00 a.m. – 11:00 a.m., 1:00 p.m. – 2:30 p.m.
- April 5, 2023: 9:00 a.m. – 11:00 a.m., 1:00 p.m. – 2:30 p.m.

WHEREFORE, the Parties respectfully requests that the Court grant this Motion and reschedule the pretrial conference currently scheduled for March 1, 2023, at 1:30 p.m.

Dated: February 27, 2023

Application granted. The initial pretrial conference is adjourned until March 29, 2023 at 2:00 p.m.  
**SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
February 28, 2023

Respectfully submitted,

/s/ Bernice E. Margolis

Bernice E. Margolis, Esq. (BM0724)

Phillip Quaranta, Esq.

**WILSON, ELSE, MOSKOWITZ,  
EDELMAN & DICKER LLP**

1133 Westchester Avenue  
White Plains, New York, NY 10604  
(212) 915-5937

File No.: 14126.00017

Email:[Bernice.Margolis@wilsonelser.com](mailto:Bernice.Margolis@wilsonelser.com)  
[Philip.Quaranta@wilsonelser.com](mailto:Philip.Quaranta@wilsonelser.com)

*Attorneys for Defendant Sensio Inc., i/s/h/a  
SENSIO, INC. d/b/a BELLA*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOTION ON CONSENT TO ADJOURN PRETRIAL CONFERENCE has been provided by electronic mail to the plaintiff's Counsel, as listed below.

Taylor A. Pruett  
*Pro Hac Vice to be filed*  
**CORY WATSON, P.C.**  
2131 Magnolia Avenue South  
Suite 200  
Birmingham, AL 35205  
(205) 328-2200  
Email: [TPruett@corywatson.com](mailto:TPruett@corywatson.com)  
*Attorney for Plaintiff DEANNE JONES*

Bernice E. Margolis

BERNICE E. MARGOLIS